

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MARCELA ERIVES, an individual,

Plaintiff,

v.

CARVANA, LLC, a foreign limited liability
company registered to do business in
Washington,

Defendant.

Case No.: 2:22-cv-00791

[Removed from the Superior Court of the
State of Washington, County of King,
Case No. 22-2-07286-5 KNT]

**STIPULATED MOTION FOR
EXTENSION OF TIME TO
ANSWER, MOVE, OR OTHERWISE
RESPOND TO THE COMPLAINT**

Noted on Motion Calendar:
June 10, 2022

Pursuant to Fed. R. Civ. P. 6(b), LCR 7(d)(1), LCR 7(j), and LCR 10(g), Plaintiff Marcela Erives (“Plaintiff”) and Defendant Carvana, LLC (“Carvana” or “Defendant”) stipulate and respectfully request that Carvana’s time to answer, move, or otherwise respond to Plaintiff’s Complaint (ECF No. 1-3) be extended by 30 days to and including July 15, 2022.

Good cause exists for the requested extension. The undersigned counsel for Carvana was recently retained on this matter and requires additional time to evaluate the claims in the Complaint and how to respond. Further, the parties are engaged in ongoing discussions regarding the appropriate forum for the claims asserted in this action.

STIPULATED MOTION FOR EXTENSION OF
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LAW OFFICES OF
COZEN O’CONNOR
A PROFESSIONAL CORPORATION
999 THIRD AVENUE
SUITE 1900
SEATTLE, WASHINGTON 98104
(206) 340-1000

1 The parties have conferred through counsel and Plaintiff consents to this request. No
2 party will be prejudiced by this extension and this request is not made for improper purposes or
3 for the purpose of delay.

4 WHEREFORE, the parties respectfully request that this Court grant this Stipulated
5 Motion and Order that Carvana's time to answer, move, or otherwise respond to the Complaint
6 be extended to and including July 15, 2022.

7
8 DATED: June 10, 2022.

9 Presented by:

10
11 COZEN O'CONNOR

12 /s/ Robert D. Lee

13 Robert D. Lee, WSBA No. 46682
14 999 Third Avenue, Suite 1900
Seattle, Washington 98104
rlee@cozen.com

15 Max E. Kaplan (*pro hac vice pending*)
16 Mira E. Baylson (*pro hac vice pending*)
COZEN O'CONNOR
17 1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19130
18 mkaplan@cozen.com
mbaylson@cozen.com

19 *Attorneys for Defendant Carvana, LLC*

20 LAKE LAW, PLLC

21 /s/ Morgan L. Lake

22 Morgan Levi Lake, WSBA No. 52789
23 3703 S. Edmunds St. #115
Seattle, WA 98118
24 PH: (360) 499-2144
morgan@morganlakelaw.com

25 *Attorney for Plaintiff, Marcella Erives*

26
STIPULATED MOTION FOR EXTENSION OF
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LAW OFFICES OF
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CERTIFICATE OF SERVICE

I hereby certify that on the date below, I caused the foregoing to be filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Morgan L. Lake, WSBA #52789
LAKE LAW, PLLC
3703 S. Edmunds St. #115
Seattle, WA 98118
PH: (360) 499-2144
morgan@morganlakelaw.com

Attorney for Plaintiff, Marcella Erives

DATED: June 10, 2022

/s/ Robert D. Lee
Robert D. Lee, WSBA No. 46682

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**[PROPOSED] ORDER GRANTING
STIPULATED MOTION FOR
EXTENSION OF TIME TO
ANSWER, MOVE, OR OTHERWISE
RESPOND TO THE COMPLAINT**

Upon good cause shown, it is hereby ORDERED that the parties' Stipulated Motion is GRANTED. Defendant's time to answer, move, or otherwise respond to the Complaint in this action is extended to and including July 15, 2022.

DATED this ____ day of _____, 2022.

RICARDO S. MARTINEZ
United States District Court Chief Judge

[PROPOSED] ORDER GRANTING STIPULATED MOTION
FOR EXTENSION OF TIME TO ANSWER, MOVE, OR
OTHERWISE RESPOND TO THE COMPLAINT - 1

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A PROFESSIONAL CORPORATION
999 THIRD AVENUE
SUITE 1900
SEATTLE, WASHINGTON 98104
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